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April 14, 2021

**Via ECF**

Honorable Paul G. Gardephe, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

Re: *Thompson et al v. Elev8 Foundation Inc. et al*  
Case No. 1:20-cv-09581 (PGG) (JLC)

Dear Judge Gardephe:

We are counsel to Plaintiffs in the above-referenced matter. We write in response to the pre-motion conference letter filed by Defendants Urban Recovery, LLC and Donna Mae Depola ("Defendants") on April 9 (Dkt. No. 27) regarding Defendants' anticipated Motion to Dismiss under Fed. R. Civ. P. 12(b)(1), (6).

We write to respectfully inform the Court that Plaintiffs intend to amend their Complaint and will file the same by April 30, 2021. Thereafter, the parties can meet and confer regarding Defendants' response to the amended pleading, and whether a further briefing schedule will be required.

We thank the Court for its time and consideration.

Respectfully submitted,

/s/ C.K. Lee  
C.K. Lee, Esq.

cc: all parties via ECF